

SBC Per Call Payphone Compensation Audit Plan

Scope

In accordance with the Final Rules in Appendix C of FCC Docket 96-128 (Order of October 3, 2003), amended in Sections 64.1300, 64.1310, and 64.1320 of the Code of Federal Regulations, the Engel audit plan will determine whether the SBC call tracking system accurately tracks Subscriber Toll Free calls to completion by verifying compliance with the nine factors enumerated by the FCC and the compliance assertions from SBC. The audit plan is focused on a review and examination of the processes, procedures, control specifications, and reports in place in each of the four SBC Regions for payphone call tracking and compensation. In addition, compliance testing will be conducted through sampling of the three key processes: 1) the creation and maintenance of the Payphone ANI Table, 2) the selection and processing of Coin AMA usage, and 3) the per call compensation and reporting processes.

Assumptions

- A matrix outlining regional differences in the payphone call tracking and compensation processes will be provided by SBC
- AMA data will be provided for test calls made in the Midwest Region and for select ANIs
- Samples of completed payphone Service Orders will be provided from each of the Service Centers
- All processing and technical documentation for each of the four Regions will be provided by SBC
- Access to the appropriate SBC team members will be provided upon request for interview and/or follow-up questions
- Dispute resolution procedures will be provided for each of the four Regions
- Data flow diagrams depicting the regional processes for payphone call tracking and compensation will be provided

Compliance Test Plan

SBC Assertions of Compliance with FCC Criteria

1. SBC has procedures in place to accurately track payphone calls to completion
 - 1.1 SBC has developed, documented, and implemented procedures and processes that identify ANIs that are payphone ANIs by Class of Service USOC and other payphone identifiers as required.

Examination: Review documentation including data flows to validate the assertion. Examine processes used to detect and resolve missing or incorrect service orders

Test: Collect sample of completed Service Orders (“D,” “N,” “C”) from the Payphone Service Center and verify sample is on the ANI Table

- 1.2 The SBC processes identify and capture outbound payphone call detail for completed calls for payphone calls originating in SBC territory.

Examination: Review process and technical documentation including the screening and selection criteria to validate assertion.

Test: Obtain and process sample of Coin AMA data and compare results with SBC EMR Call File Detail

- 1.3 The SBC processes utilize established Telecommunications industry standards (Telcordia), including format, call codes, structure codes, and data fields to determine completed payphone calls.

Examination: Review technical documentation and compare against CAFD standard

Test: Process AMA sample and determine whether the BAF standard is consistent for call codes, structure codes, and data fields

- 1.4 The SBC processes also will identify complete from not complete, and compensable from not compensable calls related to payment of PCC for toll free calls

Examination: Review process and technical documentation for the process to distinguish completions from attempts and compensable from non-compensable calls to verify assertion

Test: Process AMA and call detail records for select ANIs and create a compensable file for comparison against SBC actuals

2. SBC has assigned a specific person or persons responsibility for tracking, compensating, and resolving disputes concerning payphone completed calls

- 2.1 The Finance Operations Team ensures accurate and timely identification, processing, payment and dispute resolution of payphone originated and completed calls by utilizing a pool of experienced payphone business and technical process specialists.

Examination: Review documentation including Dispute Resolution and Per Call Compensation processes as well as M&P for payphone specialists to verify assertion

Test: Interview team lead, team member, and manager

- 2.2 The Associate Director is the Team Manager and is responsible for assigning the appropriate Team resources to execute various functional PCC processes.

Test: Interview Team Manager

3. SBC has effective data monitoring procedures in place

- 3.1 SBC has documented procedures for monitoring payphone data in the call tracking processes

Examination: *Examine monthly and quarterly reports, call volumes, trend reports, fraud reports and review procedures for receipt, review, and action.*

Test: *Walk-through the processes for volume tracking and call trending with the SBC SMEs to validate the procedures and action taken*

- 3.2 SBC procedures include the identification of errors and anomalies in the data in order to maintain an insubstantial error rate

Examination: *Review documentation to determine how data errors are identified to verify the assertion*

Test: *Select sample errors and trace their identification, analysis, and resolution through the process*

- 3.3 SBC procedures incorporate resolution of errors and anomalies in the data in order to maintain an insubstantial error rate

Examination: *Examine documentation to determine how data errors are tracked and resolved and review error resolution reports to verify the assertion*

Test: *Select sample errors and trace their identification, analysis, and resolution through the process*

- 3.4 SBC performs fraud monitoring activities to identify questionable calling activity and to identify appropriate payments to be withheld until validated as non-fraudulent in order to ensure appropriate PCC payment

Examination: *Review process documentation on fraud monitoring to validate this assertion*

Test: *Walk-through the fraud monitoring process with the SBC SMEs to validate the procedures for withholding payment and re-instating payment*

4. SBC adheres to established protocols to ensure that any software, personnel, or network changes do not adversely affect its payphone call tracking ability

- 4.1 SBC Finance Operations has integrated our organization into the SBC Billing/IT change management communication process and is the responsible organization to be notified of any impacts to the feeds, jobs or other data sources that contribute to the data used for PCC call tracking (e.g., - NPA Splits).

Examination: *Review process documentation to validate the assertion*

Test: Sample change notifications and trace through the process of notification, impact assessment, process modification, and post-change testing

- 4.2 SBC Finance Operations has established and documented a set of processes and controls and quality check reports related to PCC data capture and processing to ensure no adverse impact will be realized as a results of any software and network changes as they apply to PCC

Examination: Review process steps, PCC logs, and post-change testing to verify the assertion.

Test: Sample error and quality check reports and trace their identification, impact assessment, and resolution through the process

- 4.3 SBC Finance Operations attends functional area change control meetings that are held as part of any system or software change, in order to determine and address any functional area impacts to the PCC processes

Examination: Review meeting minutes and interview change control representative to verify assertion

- 4.4 SBC monitors software quality specific to Finance Operations PCC by random test sampling of the data outputs used to determine and pay PCC.

Examination: Review sampling process and subsequent error handling/correction processes to verify the assertion.

Test: Review results from a recent random test and trace back through the process to validate the identification of issues and their resolution

5. SBC has created call detail datasets and ANI-ownership archived data (aka PSP Data Warehouse) that are limited to payphone call detail records originated from payphones

- 5.1 SBC Finance Operations personnel create the appropriate bill feeds and supporting PCC reports by matching call detail records against pre-identified ANIs. These ANIs are identified based on their class of service. Payphone classes of service are unique.

Examination: Examine selection process and criteria used to determine compensable payphone calls and review AMA/EMR conversion process to verify assertion

Test: Verify that the sample records in the PSP DW include all of the compensable calls from the AMA test file

Test: Sample ANIs from the Billing system feed, select call detail records, and track through compensation and reports processes

6. SBC has procedures in place that incorporate payphone call data into required reports

- 6.1 SBC will create a Payphone PCC report for distribution to Payphone Service Providers based on archived data of compensation paid, identity (bill name) of PSP paid, and 8YY (SBC-carried) dialed, and 8YY calls compensated

Examination: *Examine data flow between the compensation and report processes to verify the assertion that the PSP is not only compensated but that the report reflects the same.*

Test: *Sample reports to determine whether the credits and/or checks from the appropriate month and/or quarter are reflected*

- 6.2 SBC Finance Operations will verify handling of appropriate PCC report distribution by Customer Care processes, including notification letters, PSP response logs, and delivery option specified

Examination: *Review process of PCC report notification to PSPs, tracking of responses, and generation of reports*

Test: *Observe the tracking logs and sample a report for a PSP*

7. SBC has implemented procedures and controls needed to resolve ANI and PCC disputes

- 7.1 SBC Finance Operations has developed, documented, and implemented the processes to record, investigate, and resolve PCC disputes with Payphone Service Providers

Examination: *Review process documentation, logs, history and control reports to determine compliance with assertion.*

Test: *Observe the dispute tracking logs and trace a sample of the disputes through the process from initiation through resolution*

- 7.2 SBC Finance Operations logs all disputes in accordance with internal tracking and response processes

Examination: *Review the “tracking and response” process associated with disputes and examine the logs to verify the assertion*

- 7.3 SBC Finance Operations dispute resolution processes include receipt, investigation and resolution of PSP claims for non-completed (e.g. attempts) or compensable calls, including calls originated in another LEC’s territory and terminating in SBC territory.

Examination: *Review the process documentation to determine compliance with the assertion.*

Test: *Trace sample disputes from initiation through to resolution including the log process*

8. SBC has implemented critical controls and procedures to verify that PCC has been paid accurately and in a timely manner

- 8.1 SBC Finance Operations conducts controlled random sampling of AMA/EMR/EMI records for comparison to payphone data collected and archived for determination and payment of PCC.

Examination: Review sampling and error correction procedures and associated reports to verify the assertion

Test: Review results from a recent random test and trace back through the process to validate the identification of issues and their resolution

- 8.2 SBC Finance Operations conducts analysis of payment error correction and exception reports in order to verify that payment errors are insubstantial. This includes samples of actual PSP bills that indicate PCC paid as credits on the bill.

Examination: Review process documentation on payment error handling and error report to validate assertion.

Test: Review results of recent sampling process to determine error rate

9. SBC has implemented business rules to identify payphone calls that are eligible for PCC payment

- 9.1 Calls originated from payphones in SBC territory are identified based on payphone class of service associated with the ANI.

Test: Verified from test of Assertions 1.1, 1.2, and 5.1

- 9.2 Compensable payphone calls are identified based on appropriate SBC regional Carrier identification and completion indicator.

Test: Verified from test of Assertion # 1.2 and 5.1

- 9.3 Incomplete payphone calls are identified and retained in support of potential dispute resolution

Test: Verified from test of Assertion #1.2

- 9.4 PCC is paid to the PSP who owned the line/phone at the date and time of the call

Examination: Review procedures for tracking PSP ownership to ensure compensation is paid appropriately.

Test: Sample ANIs where ownership changes mid-month to determine compliance with assertion

Compliance Test/Assertion Mapping

SBC PCC Compliance Test – Initial System Data Request

Assertion	Verification	Test	Data Request
1.1 9.1 9.4	SBC can identify and maintain a database of payphone ANIs	Sample completed payphone S/Os from the ASC and verify sample is in ANI Table Sample PubComm and NPC ANI Table updates (TBD)	- Extract of completed payphone S/Os from each Region for a given point in time - Extract of ANI Table for selected ANIs
1.2 1.3 1.4 5.1	SBC can identify, capture, and process payphone call detail per industry standards SBC can identify compensable payphone calls through appropriate business rules SBC can retain call detail for both completed calls and attempts	Process a One-Day sample of all Coin AMA data and compare results with EMI records in PSP D/W Perform test calls from selected payphones and track results in daily COIN AMA file and PSP D/W	- One-Day sample of all historical Coin AMA data for each of the Regions - Extract of PSP D/W call detail records for selected ANIs - List of payphone ANIs and payphone addresses by SBC, aggregator, and COCOT for selected locations - List of intraLATA 8YY numbers to be used for the test calls - Extract of COIN AMA data and call detail from PSP D/W for selected Test Call ANIs
9.1 9.2 9.3 9.4 6.1 6.2	SBC can identify, compensable payphone calls, can associate each with the appropriate payphone ANI, and can compensate the PSP appropriately. SBC can identify and	Sample ANIs from bill feed, select call detail records, and track through compensation and reports process Sample ANIs from ANI Table <i>not</i> on bill feed and select call detail	- Extract of all payphone ANIs from historical bill feeds from all Regions for a given month - List of Payphone ANIs by SBC, Aggregator, and COCOT for selected ANIs

Assertion	Verification	Test	Data Request
	<p>track both compensable and non-compensable calls</p> <p>SBC can create the Payphone Compensation Reports for distribution to the PSPs</p>		<ul style="list-style-type: none"> - Extract of call detail from PSP D/W for selected ANIs - Sample of ANIs from ANI Table <i>not</i> on bill feed - Account type and status information for ANIs <i>not</i> on bill feed to verify live numbers - Extract of call detail from PSP D/W for selected ANIs <i>not</i> on bill feed - Extract of Bill Detail for accounts containing selected ANIs from bill feed - Extract of journal and check distribution reports for accounts containing selected ANIs from bill feed - Monthly and quarterly reports reflecting compensation for accounts and ANIs selected from bill feed.

SBC PCC Compliance Test – Process, Procedures & Interview Request

Assertion	Verification	Test	Data Request	Interview Request
1.1 1.2	SBC can identify and maintain a database of payphone ANIs	<ul style="list-style-type: none"> - Review documentation - Examine processes used to detect and resolve 	- Payphone ANI identification procedures and process	

Assertion	Verification	Test	Data Request	Interview Request
		missing or incorrect service orders - Examine screening and selection criteria	documentation	
2.1 2.2	SBC has assigned a specific person(s) for tracking, compensating and resolving disputes	- Examine dispute history, processes and payphone process specialists activities. - Interview Team lead, member and Manager	- Organization chart for responsible group - Name of external contact - Dispute resolution documentation, logs and M & P	Manager, Team Lead, Specialist
3.1 3.2 3.3 3.4	SBC has effective data monitoring procedures	- Examine processes for receipt, review and action - Determine how errors are identified, tracked and resolved. - Review error resolution reports	- Monthly/quarterly reports, call volumes, trend reports, fraud reports - Data monitoring procedures	
4.1 4.2 4.3	SBC adheres to established change management protocols	- Examine process steps and PCC results. - Review PCC logs and post change testing - Interview Change Control representative	- Software and network change management processes and logs - PCC change statistics	Finance Operations Change Control Rep.
4.4		- Review sampling results, error handling and correction.	- Random test sampling procedures - Software maintenance agreement approach & plan	
6.2	SBC distributes reports to PSPs based on selected delivery option	- Review process and logs - Contact sample PSP to determine distribution experience.	- Sample reports - Customer Care process documentation - PSP response logs - Sample PSP contacts	

Assertion	Verification	Test	Data Request	Interview Request
7.1 7.2 7.3	SBC has implemented procedures and controls needed to resolve disputes.	<ul style="list-style-type: none"> - Review documentation and logs. - Verify tracking, response and resolution - Interview Dispute Coordinator 	<ul style="list-style-type: none"> - Dispute process documentation, logs, history and control reports. - Name of Dispute Coordinator 	Dispute Coordinator
8.1 8.2	SBC has implemented controls to verify payphone compensation errors.	<ul style="list-style-type: none"> - Review process, logs and percent of errors. - Interview Sampling Subject Matter Expert 	<ul style="list-style-type: none"> - AMA/ EMR/EMI sampling procedures & error correction reports - Error & exception reports 	Sampling Subject Matter Expert
9.4	SBC has implemented business rules to identify compensable payphone calls	<ul style="list-style-type: none"> - Sample ANIs where ownership changes mid-month to determine compliance 	<ul style="list-style-type: none"> - Procedures for tracking payphone line/phone ownership 	